

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF IOWA

In re:)	Case No.: 14-1169
)	
JODY L. KEENER)	Chapter 11
)	
Debtor and Debtor in Possession.)	Hon. Thad J. Collins
)	
PO Box 8415)	DISCLOSURE OF COMPENSATION
Cedar Rapids, IA 52408)	OF ATTORNEY FOR DEBTOR
)	[Bankruptcy Code Section 329(a), and
SSN: xx-xx-8343)	Bankruptcy Rules 2014(a), 2016(b)]
)	
_____)	No Hearing Set

Pursuant to Bankruptcy Code Section 329(a) and Bankruptcy Rules 2014(a) and 2016(b), I, Jeffrey D. Goetz, Esq., Proposed General Reorganization Counsel, and an attorney and shareholder in the law firm of Bradshaw, Fowler, Proctor & Fairgrave, P.C. (the "Firm"), file this instant Disclosure of Compensation, and certify the following:

1. Jody L. Keener, the Debtor and Debtor in Possession herein, filed its Voluntary Petition under Chapter 11 of the Bankruptcy Code (Docket Item 1) on July 28, 2014 ("Petition Date").
2. The Debtor and the Firm entered into a Chapter 11 Legal Services Agreement dated July 23, 2014, that provides for the Debtor to pay a \$100,000.00 retainer as a guaranty for payment of services in connection with representing the Debtor in contemplation of and/or in connection with a Chapter 11 reorganization case. The Firm received \$60,000.00 in trust as settlement funds and \$100,000.00 on July 21, 2014 and, pursuant to the Legal Services Agreement, the Firm is entitled to the \$100,000.00 as retainer to guaranty payment of its post-petition services and costs in connection with this Chapter 11 case. The Debtor and the Firm agreed that the Firm has earned \$104,365.28 within the year prior to the petition date in pre-

petition legal services and expenses. There remains \$107,603.83 in trust in the Bradshaw, Fowler, Proctor & Fairgrave, P.C. Client Trust Account, and will be applied to post-petition attorney fees and costs incurred, after application to and upon approval of the Bankruptcy Court.

3. I am informed and believe and thereupon allege that the source of all money received for pre-petition services and post-petition retainer was from the Debtor.

4. The Firm has not agreed to share the above-disclosed compensation with any person or persons who are not members or associates of the Firm.

5. The Debtor's agreement to pay the Firm, subject to approval of the Debtor's Motion to Employ General Reorganization Counsel, is proposed to be pursuant to the terms and conditions of the Debtor's Legal Services Agreement, a true and exact copy of which is attached as Exhibit "A" to the Motion and is incorporated by reference herein.

I declare and certify under penalty of perjury under the laws of the State of Iowa and the laws of the United States that the foregoing is true and correct and is executed this 28th day of July, 2014, at Des Moines, IA.

/s/ Jeffrey D. Goetz
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Proposed General Reorganization Counsel

CERTIFICATE OF SERVICE: This document was served electronically on parties who receive electronic notice through CM/ECF as listed on CM/ECF's notice of electronic filing. /s/ Barbara Warner